

IN THE U.S. DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA  
**ORIGINAL**

35  
9/21/00

CHARLES ISELEY,  
Plaintiff,

v.

W. CONWAY BUSHEY, et al.,  
Defendants.

FILED  
HARRISBURG, PA

SEP 20 2000

MARY E. D'ANDREA, CLERK

Deputy Clerk

Civil Action No.

1:00-CV-00577

BRIEF IN SUPPORT OF SECOND MOTION FOR APPOINTMENT OF COUNSEL

The court should appoint counsel to plaintiff because:

1. He has no access to legal research (i.e., <sup>Pack</sup> federal digests, etc.) materials because DOC policy bars access to such legal material which facilitates civil lawsuits.
2. Plaintiff was denied access to his legal papers by the defendants in retaliation for his filing the instant action.
3. Plaintiff is in the hole.
4. Plaintiff does not have a high school education.
5. Plaintiff is denied access to adequate discovery material.
6. Plaintiff is currently at Braterford prison and has no idea when he will be sent back to Coal prison. As a result, all legal property containing documents regarding this case is at Coal prison. Plaintiff has been utterly unable to know or do anything about this matter for over a month.

Conclusion

Wherefore, the court should grant plaintiff's motion.

Date: September 18, 2000

Respectfully submitted  
Charles Iseley  
Charles Iseley, AM-9320  
1 Kelley Dr.

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CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the <sup>Second</sup> ~~bring~~ Motion ~~and~~  
Appointment of Counsel and brief in support same by mailing a copy of each  
to:

Maryanne Lewis, dep. atty. gen.  
Office of Atty Gen.  
15th Floor, Strawberry Sq.  
Harrisburg, PA 17120

Date: September 18, 2000

Charles Iseley  
Charles Iseley